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7 *Falk Oral and Facial Surgery PLLC*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Falk Oral and Facial Surgery PLLC d/b/a
11 Canyon Oral and Facial Surgery, a Nevada
professional limited liability company,

12 Plaintiff,

13 vs.

14 Sudheer J. Surpure, MD, DDS, Inc. d/b/a
15 Grand Canyon Oral & Facial Surgery, a
Nevada corporation,

16 Defendant.

17 Sudheer Surpure, MD, DDS, Inc. d/b/a
18 Grand Canyon Oral & Facial Surgery, a
Nevada corporation,

19 Counterclaimant,

20 vs.

21 Falk Oral and Facial Surgery PLLC d/b/a
22 Canyon Oral and Facial Surgery, a Nevada
professional limited liability company,

23 Counter-defendant.

No. 2:21-cv-01464-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND (1) PLAINTIFF'S/
COUNTER-DEFENDANT'S
DEADLINE TO FILE RESPONSIVE
PLEADING TO COUNTERCLAIM,
AND (2) PARTIES' DEADLINE TO
FILE JOINT DISCOVERY PLAN AND
PROPOSED SCHEDULING ORDER**

[THIRD REQUEST]

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25 Pursuant to LR IA 6-1, Defendant Sudheer J. Surpure, MD, DDS, Inc., dba Grand Canyon
26 Oral & Facial Surgery ("Defendant") and Plaintiff Falk Oral and Facial Surgery PLL dba Canyon
27 Oral and Facial Surgery ("Plaintiff") submit the following Stipulation to Extend Time to file (1)
28 Plaintiff's/Counter-defendant's responsive pleading to Counterclaim up to and including

1 December 27, 2021, and (2) the parties' Joint Discovery Plan and proposed Scheduling Order up
2 to and including December 29, 2021. In support of the Stipulation, the parties state the following:

3 1. Plaintiff's/Counter-defendant's responsive pleading to the Counterclaim is
4 currently due November 24, 2021. (ECF No. 23)

5 2. The parties' Joint Discovery Plan and proposed Scheduling Order is currently due
6 November 29, 2021. (ECF No. 23)

7 3. The parties are in active settlement discussions and anticipate entering into a
8 definitive agreement shortly and thus wish to extend upcoming deadlines.

9 4. This is the third request to extend the deadline for Plaintiff/Counter-defendant to
10 file its responsive pleading to Counterclaim, and for the parties to file their Joint Discovery Plan
11 and proposed Scheduling Order.

12 5. This request for an extension of time is not intended to cause any undue delay or
13 prejudice any party.

14 6. Therefore, the parties hereby stipulate that the deadline for Plaintiff/Counter-
15 defendant to file its responsive pleading shall be extended to December 27, 2021.

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7. The parties further stipulate that the deadline for the parties to file their Joint Discovery Plan and proposed Scheduling Order be extended to December 29, 2021.

RESPECTFULLY SUBMITTED this 24th day of November, 2021.

WEIDE & MILLER, LTD.

MILLIGAN LAWLESS, P.C.

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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: November 29, 2021